

Appln No. 09/575,145  
Amdt. Dated April 10, 2006  
Response to Office Action of February 22, 2006

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### **REMARKS/ARGUMENTS**

The Applicant thanks the Examiner for the Office Action, made final, dated February 22, 2006.

#### **Claims Amendments**

Claim 1 has been amended to specify the step of "generating image data ..." in place of the previous "transmitting instructions ..." step. Basis for the tag definition can be found at page 17, lines 24-27 and page 18, lines 16-17. Basis for generating image data which includes tag image data can be found at page 74, lines 12-13 & lines 21-24.

A corresponding amendment has been made to claim 5.

#### **Claim Rejections - 35 USC § 103**

The Applicant contests the Examiner's assertion that the present invention would have been obvious to the skilled person in view of Mori combined with Dymetman.

Mori describes a system for printing photographs, wherein each photograph has a corresponding photo identification code that may be printed with the photograph in the form of a barcode. The photograph identification code allows a user to re-print the photograph by reading the barcode using a bar-code reader (see, for example, *First Embodiment* at columns 3-5 or Mori).

Dymetman describes a system for accessing further information from printed documents using an optical imaging pen which determines its location on a page from data encoded onto the page. In Dymetman's system, each page of 'Intelligent Paper' is generated by printed coded blanks and sending these to a publisher who can then overprint with graphical information (see column 11, lines 47-65 of Dymetman). The publisher must presumably make an association between coded data on each blank and the graphical information in order for Dymetman's system to work. The shortcomings of Dymetman being unable to provide interactive printed sheets on-demand has already been discussed during the prosecution of this case.

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It is submitted that neither Mori nor Dymetman would have led the skilled person to the invention as defined in claim 1 of the present application. Claim 1 requires the generation of image data which includes tag image data for printing a plurality coded tags. Each tag identifies the photograph and its location on the photograph. Once this image data has been generated, the photograph can be printed simultaneously with the coded tags in steps (d) and (e).

At no point does Dymetman generate image data which includes tag image data for simultaneously printing a plurality of such tags. Dymetman plainly generates tag image data and graphical image data separately and prints these in separate printing steps. Hence, Dymetman's interactive pages are not available to users on demand.

Furthermore, Mori does not generate tag image data for a plurality of tags, where each tag contains coded data identifying the photograph and its own location on the photograph. Mori only generates image data for a photograph and a standard barcode using standard barcode technology. Hence, whilst Mori's photographs could be made available on-demand, they have only limited interactivity in terms of what functions may achieved using an optical sensing device reading the barcode.

It is submitted that the Applicant's method of generating tag image data for a plurality of location-indicating tags, together with the usual photo image data, had not been previously conceived of in the art and represents a significant advancement over what had been described in either Dymetman or Mori. Neither Dymetman nor Mori provide a solution to the problem of how to print photographs on-demand, which have a wide range of functionalities provided via location-indicating tags. For these reasons, it is submitted that the present invention is not obvious from Mori in view of Dymetman.

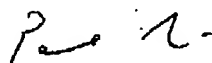
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It is respectfully submitted that all of the Examiner's objections have been successfully traversed. Accordingly, it is submitted that the application is now in condition for allowance. Reconsideration and allowance of the application is courteously solicited.

Very respectfully,

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